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Attorneys for Defendants  
ETHICON, INC. and  
JOHNSON & JOHNSON

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

DAWN WILLIAMS and DANIEL WILLIAMS, ) Case No. 4:21-cv-04285-HSG

Plaintiffs, )

v. )

ETHICON WOMEN’S HEALTH AND )  
UROLOGY, a Division of ETHICON, INC.; )  
GYNECARE, a Division of ETHICON, INC.; )  
ETHICON, INC.; and JOHNSON & JOHNSON, )

Defendants. )

**STIPULATION TO EXTEND TIME FOR  
DEFENDANTS TO RESPOND TO  
AMENDED COMPLAINT; ORDER**

**TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
CALIFORNIA:**

Defendants Ethicon, Inc. and Johnson & Johnson (“Defendants”) and Plaintiffs Dawn Williams and Daniel Williams (“Plaintiffs”), by and through their respective undersigned counsel, hereby submit this Stipulation to Extend Time for Defendants to Respond to Plaintiffs’ Amended Complaint based on the following:

**RECITALS**

1. Plaintiffs initiated this matter by filing a Complaint in the United States District Court, Northern District of California on June 4, 2021 (ECF No. 1).

2. Following a meet and confer on Defendants' intention to file a Motion to Dismiss the original Complaint pursuant to Federal Rule of Procedure 12(b)(6), the parties filed a Stipulation to Permit Filing of a First Amended Complaint and Extend Time for Defendants to Respond (ECF No. 17). This Stipulation was granted on October 5, 2021, and the Amended Complaint was ordered to be filed by October 22, 2021 (ECF No. 18). The parties then attended the Telephonic Initial Case Management Conference on November 9, 2021, at which the Court ordered the Plaintiffs to file an amended complaint by November 12, 2021. Plaintiffs filed a First Amended Complaint on November 12, 2021, with Defendants' response due December 3, 2021 (ECF No. 26).

3. Following the filing, counsel for Defendants contacted counsel for Plaintiffs to meet and confer on Defendants' intention to file a Motion to Dismiss the First Amended Complaint pursuant to Federal Rule of Procedure 12(b)(6). On November 30, 2021, Defendants served Plaintiffs with their initial disclosures pursuant to the agreed deadline in the Joint Case Management Statement (ECF No. 27). On December 1, 2021, Plaintiffs requested and Defendants agreed to allow Plaintiffs to serve initial disclosures on December 6, 2021. The parties also discussed the plan to further meet and confer on the pleading issues in Defendants' anticipated Motion to Dismiss after Defendants have an opportunity to review Plaintiffs' initial disclosures in hopes that those issues can be addressed without the need for a Motion to Dismiss.

4. To allow time for such review and further meet and confer, the parties agreed to extend the deadline for Defendants to respond to the First Amended Complaint to December 22, 2021.

### **STIPULATION**

THEREFORE, the parties, by and through their respective undersigned counsel, stipulate and agree to the following, and respectfully request that the Court enter this stipulation as an order:

Defendants' deadline to respond to the First Amended Complaint will be December 22, 2021.

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IT IS SO STIPULATED.

DATED: December 2, 2021

DOLAN LAW FIRM, PC

By: /s/ Lourdes Dearmas  
Lourdes Dearmas  
Attorneys for Plaintiffs  
DAWN WILLIAMS and DANIEL WILLIAMS

DATED: December 2, 2021

TUCKER ELLIS LLP

By: /s/ Joshua J. Wes  
Joshua J. Wes  
Attorneys for Defendants  
JOHNSON & JOHNSON and  
ETHICON, INC.

**SIGNATURE ATTESTATION**

I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

DATED: December 2, 2021


TUCKER ELLIS LLP

By: /s/ Joshua J. Wes  
Joshua J. Wes  
Attorneys for Defendants  
JOHNSON & JOHNSON and  
ETHICON, INC.

**ORDER**

PURSUANT TO STIPULATION, IT IS ORDERED that Defendants' deadline to respond to the First Amended Complaint is extended to December 22, 2021. **IT IS SO ORDERED.**

DATED: 12/2/2021



The Honorable Haywood S. Gilliam, Jr.